

EXHIBIT 'F'

John Barsum

September 8, 2003

Page 326

1 A. No.
 2 MR. DILLON: Objection to the form.
 3 Other than he's seen the other trucks down at
 4 Wisconsin?
 5 BY MR. HARRIS:
 6 Q. I'd like to show you a document that's
 7 previously been marked as P-42. It's a DeRewal
 8 Chemical invoice to Handy & Harman Tube Company in
 9 Norristown, Pennsylvania. Do you see where it says
 10 Township Line Road on there?
 11 A. Yes.
 12 Q. Looking at that document, I know we talked
 13 about Jenkintown and we talked about cyanide and we
 14 talked about the words Handy & Harman that you say you
 15 saw on a sign.
 16 A. I remember the name Norristown, that's where
 17 it was at. I remember it.
 18 Q. Having seen this piece of paper --
 19 A. It was right by Bridgeport.
 20 Q. -- do you think that you personally went to
 21 a place called Handy & Harman in, near Norristown?
 22 A. One time, that's all, Glenn. That's where
 23 it was at, Norristown, not Jenkintown. I'm sorry, I
 24 said Jenkintown. That was Standard.
 25 Q. So you went to both places; is that right?

Page 327

1 A. Yeah, I did, because I remember crossing the
 2 bridge on Ridge Road. I know, yeah.
 3 Q. So now, what did the place --
 4 A. I remember that now.
 5 Q. Now, that we're focusing on this Handy &
 6 Harman --
 7 A. One time though.
 8 Q. Okay, one time. What did that one look
 9 like? Do you remember what that one looked like?
 10 A. No, I can't remember.
 11 Q. What did you pick up the time you went
 12 there?
 13 A. Drums.
 14 Q. How many?
 15 A. Fifteen, 10 or 15.
 16 Q. Are you just guessing?
 17 A. Twelve, 15. Maybe 25. I don't know.
 18 Q. You don't remember, is that a fair
 19 statement?
 20 A. I'm saying it -- yeah, it wasn't no full
 21 trailer load.
 22 Q. Okay.
 23 A. Could have been 20; 15, 20.
 24 Q. And you don't remember what that facility
 25 looked like?

Page 328

1 A. No, that was nighttime. I remember it now
 2 when I see Norristown, yeah. I remember going across
 3 that bridge --
 4 Q. Okay.
 5 A. -- to get there.
 6 Q. All right. What were you driving?
 7 A. Fred's truck.
 8 Q. The Brockway?
 9 A. Yeah.
 10 Q. Pulling a trailer, a flat trailer?
 11 A. Yeah.
 12 Q. Where did you take those drums to be
 13 disposed?
 14 A. Philadelphia, Ontario.
 15 Q. Did you ever take waste down to Marvin
 16 Jonas's Sewell location from a DeRewal customer before
 17 Ontario opened?
 18 A. Well, I'll tell you he had a couple flatbeds
 19 there with drums to go, before Wisconsin and Ontario
 20 came in. And that's where we took it from Fred's down
 21 to Jonas. It was up there already and I just drove it
 22 down, dropped it. Frankie said just drop it right
 23 here, I put it there and dropped it.
 24 Q. Two times?
 25 A. Couple times, yeah.

Page 329

1 Q. When Mr. Lemon was asking you some
 2 questions, you said there was a time when Fred's
 3 driveway was blocked up at the site and you had to go
 4 to Kingwood?
 5 A. Well, they had the township on him, the
 6 police were there.
 7 Q. How long did that time period last? Was
 8 that for a day, a week?
 9 A. Yeah, it was a week or so. He couldn't
 10 keep -- they were coming in constantly. That's when
 11 they were keeping an eye on everything, checking.
 12 Q. All right. So that period lasted a couple
 13 weeks?
 14 A. That was a couple weeks, took to it
 15 Kingwood.
 16 Q. Did that happen only once, the blocking the
 17 driveway thing, a couple weeks?
 18 A. Well, yeah. But I don't know if you know
 19 anything about Lapsley.
 20 Q. No, that's okay.
 21 MR. HARRIS: I think I'm done.
 22 MR. LEMON: One little bit on that least
 23 piece.
 24 (EXAMINATION OF MR. BARSUM BY MR. LEMON)
 25 Q. It sounded like you were about to say

83 (Pages 326 to 329)